

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION
TO NATIONAL POSTAL MAIL HANDLERS UNION WITNESS BENTLEY
(USPS/NPMHU-T3-1 – 9)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness Christopher Bentley (NPMHU-T-3).

Respectfully Submitted,
UNITED STATE POSTAL SERVICE

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Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

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Interrogatories and Requests for Production

USPS/NPMHU-T3-1: On page 2, lines 2 through 7 of your testimony you state:

Compared to Springfield, Kansas City is a less efficient facility and is already at capacity with mail volume. The Kansas City facility processes mail on three different floors. Its elevators are already at capacity at mail-dispatch time, as even management admitted in its AMP study report (page 45). This means that adding any more mail to the facility is counter-productive because it will clog the system, slowing down delivery times even for mail that Kansas City already processes, as well as new mail that would be added to the facility.

- a Please state your understanding of whether the Postal Service considered the ability of the Kansas City P&DC to handle the increased mail volumes from the Springfield, Missouri P&DF and the Topeka, Kansas P&DF in the AMP study referenced in your testimony. If your answer does not confirm that such ability was considered, please explain and describe, in detail, any evidence in support of your answer, and produce any documents or data that you relied upon.
- b Please affirm that before filing your testimony, you reviewed page 8 of the Springfield, Missouri P&DF AMP study (file Springfield_KCMO_2-18-12_FINAL) in USPS Library Reference N2012-1/73.
- c If your answer to subpart (b) is affirmative, please state whether, when crafting your statement on page 2 of your testimony, you considered all of the information on that page under the headings "Equipment Relocation and Maintenance Costs" and "Space Impacts," including but not limited to the information concerning the installation of two new freight elevators and the build out of unoccupied space.

USPS/NPMHU-T3-2: Please refer to page 3, lines 1 through 9 of your testimony:

In addition, I do not believe that the Postal Service has adequately planned for the transportation challenges involved in moving the mail between Springfield and Kansas City, a distance of 167 miles. There are two roads between the two facilities, both state highways (not interstates). The main road is Missouri Highway 13, known as "Bloody 13." At the best of time and with minimal traffic, this trip takes over three hours. In the winter, these roads are often icy and the trip may take much longer or be impossible altogether. Indeed, in the past five years, we have had three storms (January 2007, January 2009, and January-February 2011) that reached the national disaster level, during which travel between Springfield and Kansas City was shut down for a significant period of time – sometimes as much as a week.

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- a Please describe, in detail, your experience, education, or training related to logistics management and the transportation of mail between Postal Service facilities, including but not limited to the costs and savings analyses of transporting mail.
- b Please produce any documents or data (including but not limited to any meteorological or traffic data) that you relied upon in support of your above-quoted statement on page 3 of your testimony.

USPS/NPMHU-T3-3: On Page 3, lines 12 through 16 you state:

In my experience, when Postal machines run more than four to six hours a day, they break down very frequently. The Postal Service's plan...will likely lead to additional break-downs, which will decrease the efficiency of the Kansas City facility and may slow down mail delivery....

- a Please describe, in detail, your experience, education, or training related to the maintenance procedures, routines, or operating parameters of mail processing equipment used by the Postal Service, including but not limited to the mail processing equipment located at the Springfield, Missouri P&DF.
- b Please articulate any distinction you make between a machine jam and a machine breakdown.
- c Quantify the average duration of the breakdowns and jams that you describe in response to part (b) and in the above-quoted passage in your testimony.
- d Please identify the machine run-time and maintenance records that you maintain or otherwise have examined in your postal experience, and that you relied upon in support of your above-quoted statement.

USPS/NPMHU-T3-4: On Page 3, lines 20 through 25 and Page 4, lines 1 through 3 of your testimony you state:

While mail volume is declining across the country, letter cancellations in the Springfield P&DC have actually increased. In July 2011, Postal management began sending Springfield's Saturday mail to be cancelled and processed in Kansas City, meaning that Springfield now cancels letters only five days per week instead of six. Despite the loss of one day of mail each week, Springfield's monthly cancellation numbers stayed the same – between 5.5 million and 6 million letters. In February 2012, Springfield's letter cancellations increased by 308,000 letters over the same month in 2011, jumping from 5.2 million letters to 5.5 million, even though there were three fewer cancellation days this year.

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- a Please provide citations to any publicly available documents or data that you relied upon in support of the above-referenced statement.
- b If no publicly available documents or data are available, please describe, in detail, any evidence in support of your statement on pages 3 and 4 of your testimony and produce any documents or data that you relied upon.

USPS/NPMHU-T3-5: On page 4, lines 23 through 25 of your testimony you state:

[t]he study anticipates a savings in management costs of \$1.12 million (see page 31) – a savings that simply cannot be true in any real sense, if seven additional positions will be needed.

- a Is it your understanding that, in its AMP study for the Springfield P&DF in USPS Library Reference N2012-1/73, the Postal Service calculated management savings based upon the change in total work hours. If that is not your understanding, please explain.
- b Please describe, in detail, any evidence in support of the above-quoted statement, and produce any documents reflecting data and analysis that you relied upon.
- c Please confirm that before filing your testimony, you reviewed page 31 of the Springfield, Missouri P&DF AMP study (file Springfield_KCMO_2-18-12_FINAL) in USPS Library Reference N2012-1/73. If you do not confirm, please explain your response.
- d If your answer to subpart (c) is affirmative, please confirm whether you considered the information on this page concerning the proposed 9.7 percent reduction in management work hours when crafting the above-quoted statement on Page 4 of your testimony. If you do not confirm, please explain your response.
- e Please affirm that before filing your testimony, you reviewed page 11 of the Response of USPS Witness Williams to Question Posed By Commissioner Taub During March 20, 2012 Cross-Examination, which was filed on March 30, 2012, available at:

<http://www.prc.gov/Docs/81/81803/V2.p.422.HW.Dave.pdf>
<http://www.prc.gov/Docs/81/81803/Homework.Vol.2.p.422.xls>
- f If your answer to (e) is affirmative, please confirm whether you considered all of the information under the heading “Management (PCES and EAS) Saving Calculations,” including but not limited to the information concerning why AMP workbooks may show both management savings and an increase in management positions. If you do not confirm, please explain your response.

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USPS/NPMHU-T3-6: On page 6, lines 4 through 8 of your testimony you state:

[t]he AMP does not budget a single additional dollar for maintenance or mail processing equipment in Kansas City (see page 37). It is simply unbelievable that the Postal Service could add many more pieces of equipment, and increase the amount of mail processed by about 40%, yet not incur additional maintenance costs.

- a Please affirm that before filing your testimony, you reviewed page 37 of the Springfield, Missouri P&DF AMP study (file Springfield_KCMO_2-18-12_FINAL) in USPS Library Reference N2012-1/73.
- b If your answer to (a) is affirmative, please confirm whether you considered the information on this page, including but not limited to the addition of \$1.714 million (under “adjustments”) to the proposed maintenance costs for the Kansas City P&DC. If you do not confirm, please explain your response.

USPS/NPMHU-T3-7: On page 6, lines 16 through 26 of your testimony you state that the estimated cost of renovating the Kansas City P&DC appears:

[t]o be a rough estimate, and is already double what management first estimated at Labor-Management meetings in December 2011 and January 2012.

- a Please describe, in detail, your experience, education, or training related to the assessment and calculation of projected construction costs, and produce any documents or data relied upon in support of the above-quoted statement.
- b Please describe, in detail, the Labor-Management meetings you attended regarding the estimation of renovation costs at the Kansas City P&DC, including but not limited to the identity of management officials who spoke at the meeting, the time when the meetings occurred, the location of the meetings, and the mode of communication at the meetings, be they in-person, telephonic, or by any other means, and produce any documents relating to those meetings.

USPS/MPMHU-T3-8: On page 7, lines 5 through 7 of your testimony you state:

The Mail volume will remain the same, and the machines will require the same staffing, so the work will still require the same amount of time and the same number of employees.

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- a Please describe, in detail, your experience, education, or training related to the computation of adequate staffing levels at mail processing facilities and produce any documents or data that you relied upon in support of the above-quoted statement.
- b Please state your understanding of whether the Postal Service, in its AMP study for the Springfield P&DF in USPS Library Reference N2012-1/73, provided calculations for future staffing levels in the Springfield, Missouri P&DF and the Kansas City, Missouri P&DC. If you do not confirm that such calculations were performed, please explain.
- c Please affirm that before filing your testimony, you reviewed pages 5 through 9 of the Response of USPS Witness Williams to Question Posed By Commissioner Taub During March 20, 2012 Cross-Examination, which was filed on 3/30/2012, available at:

<http://www.prc.gov/Docs/81/81803/V2.p.422.HW.Dave.pdf>
<http://www.prc.gov/Docs/81/81803/Homework.Vol.2.p.422.xls>
- d If your answer to (c) is affirmative, please confirm whether you considered all of the information under the heading "Specific description of AMP savings calculations: mail processing workhours moving from the losing site to the gaining site," including but not limited to the information concerning the Breakthrough Productivity Initiative (BPI) calculations.

USPS/NPMHU-T3-9: On page 7, lines 17 through 19 of your testimony you state:

Consolidating the mail also consolidates the problems and difficulties of processing it. I expect longer operating windows will decrease efficiency and provide worse service to the American people.

Please describe, in detail, your experience, education, or training related to the modeling, design, or implementation of mail processing procedures and timelines, and produce any documents or data relied upon in support of the above quoted statement.